

## **EXHIBIT 2**

# **Antoinette Ward's Deposition Transcript**

Antoinette Ward  
02/21/2019

5 TEOKA S. WILLIAMS.

7 Plaintiff,

8 Hon. Victoria A. Roberts

9 vs Case No. 2:18-cv-12522-VAR-MKM

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11 BEAUMONT HEALTH,

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13 Defendant.

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19 the above-entitled matter before Notary Public, Patricia  
20 A. Lutza, CSR, CRR, at the 19th District Court, 16077  
21 Michigan Avenue, Dearborn, Michigan, on Thursday, February  
22 21, 2019, commencing at about 11:30 a.m.

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1 A. I went to the patient's room. I introduced myself.  
2 I said, Oh. I heard you had a little trouble last  
3 night, you know. What happened. And she said that  
4 she felt the nurse was a little rough with her and I  
5 said, Well, what happened. She said, She grabbed  
6 me, and I knew that the patient was trying to get  
7 out of bed and the bed alarm went off and Teoka went  
8 to grab her so she wouldn't fall, so I explained  
9 that to her. I said, Oh, I think she was just  
10 helping you so that you wouldn't fall, and so we  
11 just talked a little bit about that and I asked her  
12 if she was okay, if she needed anything, and I think  
13 that was the end of the conversation. She was fine.

14 Q. When Crystal talked to you or communicated with you,  
15 did Crystal tell you that Teoka Williams had  
16 reported to her that she heard the patient call her  
17 a black bitch?

18 A. I don't remember that.

19 Q. Is that something you would remember?

20 A. I would think so.

21 Q. Now, your -- so your testimony is you don't remember  
22 Crystal saying that?

23 A. Correct.

24 Q. All of this stuff about the patient thinking Teoka  
25 grabbed her, something about the bed, helping her,

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1 Q. So before you went and talked to the patient you  
2 knew that the progress notes stated, Patient could  
3 be heard from the hallway, I do not want that black  
4 bitch taking care of me. You would have reviewed  
5 that before you talked to the patient; right?

6 A. I would have, yes.

7 Q. You would also have reviewed notes which are under  
8 11/2/2017, at 4:48 a.m., stating, in part, Patient  
9 stated that she had to use the rest room. When  
10 patient stood up, nurse noticed the patient losing  
11 her balance, so N gently but quickly grabbed patient  
12 by her left arm to prevent the patient from  
13 falling -- RN. I said N, I meant RN. Thank you.  
14 Patient then yelled, I want a different nurse. Do  
15 you see that?

16 A. I see it.

17 Q. Then I read that correctly into the record?

18 A. Yes.

19 Q. And that's what you were referring to when you  
20 testified about what supposedly happened; correct?

21 A. Correct.

22 Q. So do you recall whether or not Crystal told you  
23 that Teoka had complained or reported to her that  
24 she had been referred to as the black bitch by this  
25 patient?

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1 your interpretation. Because the question is not  
2 clear, you are giving your interpretation of what is  
3 in the document. Ask her what her interpretation  
4 is.

5 MS. GAFKAY: Are we done coaching our  
6 witnesses here?

7 MS. DAHLE: I am not coaching my witness.  
8 Ask a fair question, which she has already answered  
9 several times, you don't like the answer. But go  
10 ahead. Ask her again.

11 BY MS. GAFKAY:

12 Q. Well, did you have reason to disbelieve Teoka?

13 MS. DAHLE: As to what are you asking now?  
14 You can answer, if you can.

15 THE WITNESS: No.

16 BY MS. GAFKAY:

17 Q. When you talked to the patient, did you ask the  
18 patient, Did you call our care-giver a black bitch?

19 A. No.

20 Q. Did you ask the patient specifically whether she had  
21 made a request for different care based on race?

22 A. No.

23 Q. So all you knew was that the patient did not deny  
24 that her request was based on race, did she?

25 MS. DAHLE: Object to the form of the

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1 her question?

2 BY MS. GAFKAY:

3 Q. Go ahead. If you don't understand --

4 MS. DAHLE: Yes, object to the form of the  
5 question.

6 BY MS. GAFKAY:

7 Q. You can still answer the question.

8 A. Ask it again.

9 Q. Sure. If a patient is heard calling a care-giver a  
10 black bitch and requests not to have that  
11 care-giver, in your mind, are you suggesting that  
12 doesn't relate to race?

13 A. No.

14 Q. The progress notes also indicate, Advise not to  
15 enter room anymore. Do you see that in the progress  
16 note? It's 11/2/2017, 5:02 a.m., and it's in the  
17 middle.

18 A. I see it.

19 Q. So based on the progress note that was done on the  
20 night in question, Teoka Williams was stating,  
21 Advised not to enter room anymore. Do you see that?

22 A. I see it.

23 Q. Do you have any reason to doubt that?

24 A. I wasn't there. I didn't hear it. I don't know  
25 that she was advised that. I don't know.

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1 Q. What did you say, if anything, to the patient, other  
2 than what you have already testified to?

3 A. That's it.

4 Q. What else did the patient say, if anything?

5 A. Nothing.

6 Q. You had a patient encounter; correct?

7 A. Correct.

8 Q. And where, if anywhere, did you put that in the  
9 patient's note, chart. Where did you record it?

10 A. I didn't.

11 Q. As a nurse, are there times that you record patient  
12 encounters?

13 A. Yes.

14 Q. Do you agree that you could have recorded the  
15 patient encounter on this occasion?

16 A. There was no reason.

17 Q. You chose not to?

18 A. I chose not to.

19 Q. Isn't it true that Ms. Ward [sic] communicated with  
20 you because she was concerned that Teoka, that the  
21 patient wanted a different nurse based on race?

22 A. I'm Ms. Ward.

23 Q. I'm sorry. That Crystal -- let me ask it again.  
24 Sorry. Isn't it true that Crystal talked to you  
25 about the patient wanting a different nurse because

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1 you were attending or what the meeting related to?

2 A. I was told that they were going to discuss some  
3 issues with Teoka that Teoka had raised and this is  
4 just one of the issues and that's why they asked me  
5 to come.

6 Q. What was the issue?

7 A. The incident that happened and that Teoka was  
8 concerned about how her, the assignment of the  
9 patient was handled.

10 Q. Were you provided with any type of communication  
11 that Teoka had provided to Ms. Fildew? For  
12 instance, were you forwarded or provided a copy to  
13 read of any emails from Teoka Williams to  
14 Ms. Fildew?

15 A. I was sent an email.

16 Q. With regard to communications with Crystal after the  
17 incident, whether by email or in person, did you say  
18 anything to Crystal or communicate anything to  
19 Crystal about asking her why she didn't just  
20 reassign Teoka Williams completely, or anything to  
21 that affect?

22 A. We did talk about that.

23 Q. What did you talk about in that regard?

24 A. I asked her, you know, why she didn't like totally  
25 reassign that patient to Olivia. It was more of a

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1 patient that she was told no longer to perform with  
2 regard to that patient; correct?

3 A. Correct.

4 Q. For instance, providing medication?

5 A. Um-hmm.

6 Q. Yes? You have to say yes.

7 A. Yes.

8 Q. That's something the nurse is supposed to do that's  
9 assigned to the patient; correct?

10 A. Correct?

11 Q. And the duty of providing medication was reassigned  
12 to Olivia; correct?

13 A. Correct.

14 Q. Prior to November 8, 2017, the meeting, is there  
15 anything else, any other communications with anybody  
16 or anything else that involved the allegations of  
17 Ms. Williams' complaint that you were involved in,  
18 any communications or anything that you can recall  
19 that you haven't already testified to?

20 A. Kelly Fildew asked me to investigate this incident.

21 Q. Did you investigate?

22 A. Yes.

23 Q. What did you do to investigate?

24 A. I talked to Crystal a little bit further. I believe  
25 I talked to Olivia again just to get it clear. I

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1 talked to -- well, I don't know if it was at that  
2 time that I talked to one of the nursing assistants.

3 Q. Which one?

4 A. Cathy Forte.

5 Q. Well, do you recall talking to Cathy Forte at a  
6 later date?

7 A. I talked to her -- at some point in time I did talk  
8 to her.

9 Q. When is your best recall of when you talked to her?

10 A. Well, that's what I am not sure of.

11 Q. It sounds like you don't believe it was near the  
12 incident?

13 A. Yeah, I think it was after, like a period of time  
14 after.

15 Q. So not part of your investigation?

16 A. Correct.

17 Q. So the investigation, as you are calling it,  
18 included talking to Crystal and talking to Olivia;  
19 right?

20 A. Correct.

21 Q. Nothing else?

22 A. Not that I can remember.

23 MS. DAHLE: Other than the patient. She  
24 told you she talked to the patient.

25 BY MS. GAFKAY:

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1 or Olivia provide you with any type of an electronic  
2 documentation concerning what happened?

3 A. Olivia did not. I am unsure if Crystal --

4 Q. You are talking about that initial email?

5 A. Yes.

6 Q. I am talking about for the investigation.

7 A. No, she did not.

8 Q. And you didn't reduce any of your notes regarding  
9 any investigation in writing, to your knowledge?

10 A. No, not to my knowledge.

11 Q. And your investigation, did it include talking to  
12 Teoka Williams?

13 A. I think Teoka and I only spoke at the meeting. I  
14 don't remember speaking to her any other time.

15 Q. So outside of the meeting, there was no  
16 communication with Teoka with regard to your  
17 investigation, was there?

18 A. Not that I remember.

19 Q. All right. So tell me everything that you recall  
20 concerning your discussion with Crystal and the  
21 investigation.

22 A. I just asked her to explain a little deeper what  
23 happened to me -- I mean, what happened that night.  
24 Our initial conversation was very brief. I asked  
25 her just for more detail.

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1 Q. And you would agree that Teoka was concerned she was  
2 removed from caring for the patient based on race?

3 A. Yes.

4 Q. Are you aware of any policy of Beaumont that in any  
5 way addresses requests for care based on race by  
6 patients?

7 A. What time frame?

8 Q. At any time. Well, let me ask you first. In  
9 November of 2017 were you aware of any such policy?

10 A. No.

11 Q. Sitting here today, are you aware of any such  
12 policy?

13 A. Yes.

14 Q. And when did you become aware of the policy?

15 A. I don't know the date, time.

16 Q. But it was after November 2017?

17 A. Correct.

18 Q. Is it in writing?

19 A. I believe it is.

20 Q. Have you seen it?

21 A. I don't remember if I have seen it or not.

22 Q. What do you believe the policy to say?

23 A. The current policy, I believe, says that if a  
24 patient requests a different nurse because of race,  
25 that we will not accommodate that.